Reisinger v. City of Wilkes Barre et al Doc. 21

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOSEPH R. REISINGER,	**: CIVIL ACTION – LAW**
	:
Plaintiff,	**:**
	: JURY TRIAL DEMANDED
v.	**:**
	:
THE CITY OF WILKES BARRE, et al.	**: (Hon. Richard P. Conaboy)**
	:
Defendants.	**: No. 3:09-CV-210**

MOTION TO EXTEND THE DISCOVERY AND EXPERT REPORT DEADLINES

NOW COMES, the Plaintiff by his attorneys THE LOFTUS LAW FIRM, P.C. and moves for an extension of discovery and expert report deadlines in the captioned matter as follows:

1. Plaintiff's expert reports are due on October 31, 2009.
2. Discovery is scheduled to end on November 30, 2009.
3. Discovery is currently ongoing, however, due to the number of Defendants and the complexity of the case, an extension is agreed upon by all parties.
4. A sixty (60) day extension for expert reports and a ninety (90) day extension for discovery would be appropriate and allow enough time to complete all discovery.

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5. Plaintiff's expert reports would be due on December 31, 2009, and Defendants' expert reports and the discovery deadline would be January 31, 2010.

6. All parties concur with these extensions.

WHEREFORE, it respectfully requested that the Court grant a sixty (60) day extension of expert reports and a ninety (90) day extension for the completion of discovery. Plaintiff's expert reports due on December 31, 2009 with Defendants' expert reports and discovery deadline on January 31, 2010.

Respectfully Submitted,

THE LOFTUS LAW FIRM, P.C.

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